

Stephanie D. Curtis (SBN 05286800)  
Christopher L. Harbin (SBN 24083134)  
Ivan O. Turingan (SBN 24026294)  
**CURTIS | LAW PC**  
901 Main Street, Suite 6515  
Dallas, Texas 75202  
Telephone: 214.752.2222  
Facsimile: 214.752.0709  
Email: scurtis@curtislaw.net  
charbin@curtislaw.net  
ituringan@curtislaw.net

COUNSEL FOR DEBTOR  
RICHARD KEVIN RUSSELL

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**IN RE:**

**RICHARD KEVIN RUSSELL<sup>1</sup>,**  
  
*Debtor.*

§  
§  
§  
§  
§  
§  
§  
**Case No. 22-41793-mxm11**

INDEPENDENCE FUEL SYSTEMS, LLC  
  
*Plaintiff,*  
  
v.

§  
§  
§  
§  
§  
§  
§  
**Adversary No. 22-04049-mxm**

**RICHARD KEVIN RUSSELL,**  
  
*Defendant.*

**CURTIS | LAW PC'S UNOPPOSED MOTION TO WITHDRAW  
AS COUNSEL FOR DEFENDANT RICHARD KEVIN RUSSELL**

**TO THE HONORABLE MARK X. MULLIN,  
UNITED STATES BANKRUPTCY JUDGE:**

**COMES NOW**, Curtis | Law PC and its attorneys (together, "CLPC" or "the Firm"), withdrawing counsel for Richard Kevin Russell ("Russell" or "Debtor" or "Defendant"), to respectfully file this *Unopposed Motion to Withdraw as Counsel for Defendant Richard Kevin Russell* (the "Motion") and show the Court as follows:

1. CLPC respectfully seeks to withdraw as counsel for Russell before this Court, and

---

<sup>1</sup> Richard Kevin Russell, Address: 4767 Overton Woods Drive, Fort Worth, Texas 76109, SSN: XXX-XX-7228.

to be discharged by this Court from representing Russell in this proceeding and any and all appellate matters related to this proceeding.

2. Good cause exists for CLPC's withdrawal because of Russell's breach of the financial terms of his engagement with the Firm.

3. This matter is set for trial docket call on October 26, 2023 at 9:00 am.

4. Mr. Russell has consented to this withdrawal and is aware of all deadlines in this adversary proceeding. Mr. Russell has received a copy of this Motion. Counsel will send Mr. Russell a copy of the signed order, as well as a letter stating any settings for trial, hearings, or discovery deadlines, and advising him to secure other counsel. Mr. Russell's consent to withdrawal, which includes disclosure of all upcoming deadlines, is attached hereto as Exhibit 1.

5. This Motion to Withdraw is filed in good faith and is not filed for purposes of delay.

WHEREFORE, PREMISES CONSIDERED, the Firm respectfully requests that the Court grant this Motion to Withdraw, allow the Firm and its attorneys to withdraw as counsel for Defendant Richard Kevin Russell in this case, and grant the Firm such other relief, both special and general, at law or equity, to which it may otherwise be entitled.

Dated: October 11, 2023.

Respectfully submitted,

/s/ Christopher L. Harbin

Stephanie D. Curtis

Texas State Bar No. 05286800

Christopher L. Harbin

Texas State Bar No. 24083124

Ivan O. Turingan

Texas State Bar No. 24026294

**CURTIS | LAW PC**

901 Main Street, Suite 6515

Dallas, Texas 75202

Telephone: 214.752.2222

Facsimile: 214.752.0709

Email: [scurtis@curtislaw.net](mailto:scurtis@curtislaw.net)

[charbin@curtislaw.net](mailto:charbin@curtislaw.net)

[ituringan@curtislaw.net](mailto:ituringan@curtislaw.net)

**WITHDRAWING COUNSEL FOR  
DEFENDANT RICHARD KEVIN  
RUSSELL**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on October 11, 2023, a true and correct copy of the foregoing document was electronically filed and served upon all parties who receive ECF service in this adversary case.

/s/ Christopher L. Harbin  
Christopher L. Harbin

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that he has made reasonable efforts to resolve the issues related to this Motion with attorneys for Independence Fuel Systems, LLC, and they have indicated that they are unopposed to the relief requested in this Motion.

/s/ Christopher L. Harbin  
Christopher L. Harbin